



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

October 2, 2018

ALEXANDRA ROJAS, TREASURER  
JUSTICE DEMOCRATS  
P.O. BOX 910  
KNOXVILLE, TN 37902

**Response Due Date**  
**11/06/2018**

IDENTIFICATION NUMBER: C00630665

REFERENCE: AMENDED YEAR-END REPORT (07/01/2017 - 12/31/2017), RECEIVED  
07/15/2018

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in enforcement action.** Additional information is needed for the following 2 item(s):

1. Schedule A supporting Line 15 of your report discloses an offset to an operating expenditure totaling \$3,155.56 from "Bernal Alto LLC"; however, your report(s) does not appear to disclose a disbursement to this entity. Please provide clarifying information regarding this activity and amend your report(s) if necessary. (11 CFR § 104.3(a) & (b))
2. Your report discloses negative entries on Line 21(b) with a purpose of "Operating Costs moved to Line 23 as in-kind contributions" and corresponding positive disbursements for "In-Kind Facebook Ads" and "In-Kind Campaign T-Shirts" disclosed on Line 23. Please be advised that offsetting negative entries on Line 21(b) should only be disclosed when reporting in-kind contributions of committee-owned assets (see attached for further guidance on reporting in-kind contributions to federal candidates). Please provide further clarifying information or amend your report to properly disclose the in-kind activity.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will**

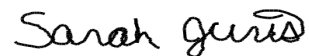
JUSTICE DEMOCRATS

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**not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

Sincerely,

A handwritten signature in black ink that reads "Sarah Juris". The signature is written in a cursive, flowing style.

Sarah Juris  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

## Campaign Guide for Nonconnected Committees

### IN-KIND CONTRIBUTIONS TO CANDIDATES

| SCHEDULE B (FEC Form 3X)<br>ITEMIZED DISBURSEMENTS   |  | Use separate schedule(s)<br>for each category of the<br>Detailed Summary Page |  | FOR LINE NUMBER:<br>(check only one)  |                              | PAGE 1 OF 1                  |                             |
|--|--|---|--|---|------------------------------|------------------------------|-----------------------------|
| Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. |  | <input checked="" type="checkbox"/> 21b                                       |  | <input type="checkbox"/> 22   | <input type="checkbox"/> 23  | <input type="checkbox"/> 24  | <input type="checkbox"/> 25 |
|  |  | <input type="checkbox"/> 27   |  | <input type="checkbox"/> 28a  | <input type="checkbox"/> 28b | <input type="checkbox"/> 28c | <input type="checkbox"/> 29 |
|  |  |   |  | <input type="checkbox"/> 26   | <input type="checkbox"/> 30b |                              |                             |
| NAME OF COMMITTEE (In Full)<br>Civil Republic PAC  |  |   |  |   |                              |                              |                             |
| Full Name (Last, First, Middle Initial)  |  |   |  |   |                              |                              |                             |
| A. Westroads Liquor  |  |   |  | Date of Disbursement  |                              |                              |                             |
| Mailing Address<br>19 Main Street  |  |   |  | MM / DD / YYYY<br>08 / 26 / 2008  |                              |                              |                             |
| City<br>City   |  |   |  | State<br>ST   |                              |                              |                             |
| Zip Code<br>00000  |  |   |  |   |                              |                              |                             |
| Purpose of Disbursement<br>Reception   |  |   |  | 011   |                              |                              |                             |
| Candidate Name<br>Stephen Bagwell  |  |   |  | Category/<br>Type   |                              |                              |                             |
| Office Sought:<br><input type="checkbox"/> House<br><input type="checkbox"/> Senate<br><input type="checkbox"/> President  |  |   |  | Disbursement For:<br><input type="checkbox"/> Primary<br><input type="checkbox"/> General<br><input type="checkbox"/> Other (specify) |                              |                              |                             |
| State:<br>District:  |  |   |  | Amount of Each Disbursement this Period<br>972.40   |                              |                              |                             |
| MEMO: In-kind:<br>See Schedule B, Line 23  |  |   |  |   |                              |                              |                             |

| SCHEDULE B (FEC Form 3X)<br>ITEMIZED DISBURSEMENTS   |  | Use separate schedule(s)<br>for each category of the<br>Detailed Summary Page |  | FOR LINE NUMBER:<br>(check only one)   |                              | PAGE 1 OF 1                  |                             |
|--|--|---|--|--|------------------------------|------------------------------|-----------------------------|
| Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. |  | <input type="checkbox"/> 21b  |  | <input checked="" type="checkbox"/> 23   | <input type="checkbox"/> 24  | <input type="checkbox"/> 25  | <input type="checkbox"/> 26 |
|  |  | <input type="checkbox"/> 27   |  | <input type="checkbox"/> 28a   | <input type="checkbox"/> 28b | <input type="checkbox"/> 28c | <input type="checkbox"/> 29 |
|  |  |   |  | <input type="checkbox"/> 26  | <input type="checkbox"/> 30b |                              |                             |
| NAME OF COMMITTEE (In Full)<br>Civil Republic PAC  |  |   |  |  |                              |                              |                             |
| Full Name (Last, First, Middle Initial)  |  |   |  |  |                              |                              |                             |
| A. Westroads Liquor  |  |   |  | Date of Disbursement   |                              |                              |                             |
| Mailing Address<br>19 Main Street  |  |   |  | MM / DD / YYYY<br>08 / 24 / 2008   |                              |                              |                             |
| City<br>City   |  |   |  | State<br>ST  |                              |                              |                             |
| Zip Code<br>00000  |  |   |  |  |                              |                              |                             |
| Purpose of Disbursement<br>Reception   |  |   |  | 011  |                              |                              |                             |
| Candidate Name<br>Stephen Bagwell  |  |   |  | Category/<br>Type  |                              |                              |                             |
| Office Sought:<br><input checked="" type="checkbox"/> House<br><input type="checkbox"/> Senate<br><input type="checkbox"/> President   |  |   |  | Disbursement For:<br><input type="checkbox"/> Primary<br><input checked="" type="checkbox"/> General<br><input type="checkbox"/> Other (specify) |                              |                              |                             |
| State: ST<br>District: 08  |  |   |  | Amount of Each Disbursement this Period<br>972.40  |                              |                              |                             |
| In-kind  |  |   |  |  |                              |                              |                             |

and indicate the report on which the original contribution was itemized.

In the illustration on the next page, a nonconnected committee originally made a \$10,000 contribution to a candidate's campaign, intending half of it to count toward the general election. The nonconnected committee itemized the contribution in its April quarterly report. The following month, the campaign requested that the committee redesignate the excessive \$5,000 for the general election campaign. The nonconnected committee then itemized the redesignation in its July quarterly report.

### Memo Entry

Use a memo entry on a schedule to provide information that is not included in the schedule's total dollar figure. Memo entries are used, for example, to disclose the redesignation of a contribution.

Filers should exercise caution not to confuse "memo entries" with the "memo text" function used to supply additional information when filing electronically using FECFile.

### Additional Information on Candidates

Further information is required when itemizing a contribution to a candidate committee on Schedule B. List the candidate's name and the office sought (including the state and, if applicable, Congressional district). When itemizing a contribution or loan to a candidate committee, specify the election for which the payment was made by checking the appropriate category in the election designation box. 104.3(b)(3)(v). See illustrations above.

### Redesignations of Contributions

Use memo entries to show any redesignations of contributions.

If a contribution to a candidate is redesignated for a different election after the close of books for the reporting period during which the contribution was made, show the redesignation on the next report